## MATHIS, RIGGS, PRATHER & RATLIFF, P.S.C.

#### ATTORNEYS AT LAW

500 MAIN STREET, SUITE 5 SHELBYVILLE, KENTUCKY 40065

C. LEWIS MATHIS, JR. T. SHERMAN RIGGS DONALD. T. PRATHER NATHAN T. RIGGS ERIN R. RATLIFF

TELEPHONE: (502) 633-5220

FAX: (502) 633-0667

E-MAIL: dprather@iglou.com

May 9, 2014

RECEIVED

MAY 1 2 2014

Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Blvd P.O. Box 615 Frankfort, KY 40602

PUBLIC SERVICE COMMISSION

U.S. 60 Water District Re:

> Application of U.S. 60 Water District for New Nonrecurring Charges and an Increase in Existing Nonrecurring Charges

Case No. 2014-00039

Dear Mr. Derouen:

Enclosed are the original and eight (8) copies of the Motions to be filed on behalf of U.S. 60 Water District of Shelby and Franklin Counties, Kentucky.

Thank you very much for your attention to this matter. Please contact me if you have any questions regarding this matter.

Yours truly,

MATHIS, RIGGS, PRATHER & RATLIFF, P.S.C.

DTP/pm Enclosure

#### COMMONWEALTH OF KENTUCKY

**RECEIVED** 

#### BEFORE THE PUBLIC SERVICE COMMISSION

MAY 1 2, 2014

In the Matter of:	PUBLIC SERVICE COMMISSION
	COMMOSign

}	
}	
}	CASE NO. 2014-00039
•	
}	
	}

## **MOTIONS**

Comes U.S. 60 Water District of Shelby and Franklin Counties, Kentucky, Inc. ("U.S. 60"), by counsel, and respectfully makes the following Motions:

- 1. U.S. 60 moves to increase the non-recurring charge for a 5/8 x 3/4 inch meter from the original \$1,000 to \$1,200. A new Average Meter Connection Expense Cost Justification worksheet is attached to this Motion. This represents an increase of 20% and is due to the increased costs of the radio read meters now being installed by U.S. 60 and the fact that U.S. 60 is charged a flat fee of \$135 for each trip for a dump truck and trailer, rather than mileage. The amounts for installation labor expense and installation equipment expense have decreased based upon the information from the work orders attached under Tab 14 to U.S. 60's Supplemental Answers to Commission Staff's First Request for Information. This requested amount has been rounded up from \$1,185.63 shown on the worksheet to \$1,200 based upon the fact that U.S. 60 knows the installation labor expenses will be more in the future because the employees did not know they were supposed to include on their work orders time spent at the office reviewing work orders and pulling the necessary materials prior to leaving for a job and the time spent at the office following the job completing the required paperwork, including the figures on the work orders.
- 2. U.S. 60 moves to change the requested non-recurring charge for a 1-inch meter from \$1,275 to actual cost. This request is based upon the fact that U.S. 60 did not set any 1-inch meters

during the test period reflected by the aforementioned work orders.

3. U.S. 60 moves the Commission to not require U.S. 60 to re-advertise these two revised non-recurring charge amounts based upon the additional cost which would be incurred by advertising in the four counties comprising U.S. 60's service territory. The previous advertisement in each of those four counties specifically stated that "The PSC may order rates to be charged that differ from these proposed rates." The proposed 20% change in the 5/8 x 3/4 inch meter tap-on fee is not a sufficient change to require re-advertisement.

Respectfully submitted,

Mathis, Riggs, Prather & Ratliff, P.S.C.

Donald T. Prather

500 Main Street, Suite 5

Shelbyville, Kentucky 40065

Phone: (502) 633-5220 Fax: (502) 633-0667

Attorney for U.S. 60 Water District of Shelby and Franklin

Counties, Kentucky, Inc.

COMMONWEALTH OF KENTUCKY	)
COUNTY OF SHELBY	)

The undersigned, David Hedges, being duly sworn, deposes and states that he is Manager of U.S. 60 Water District of Shelby and Franklin Counties, Kentucky, Inc., Movant in the above proceedings; that he has read the foregoing Motions and the attached Average Meter Connection Expense Cost Justification worksheet, and has noted the contents thereof; that the same are true of his own knowledge, except as to matters which are therein stated on information or belief, and as to those matters, he believes same to be true.

David Hedges

STATE OF KENTUCKY	
COUNTY OF SHELBY	)
Subscribed and sworn to be	fore me by David Hedges, Manager of U.S. 60 Water District of Shelby and
Franklin Counties, Kentuck	fore me by David Hedges, Manager of U.S. 60 Water District of Shelby and y, Inc., on this the day of, 2014.
	12.00) MENON
	Notary Public
	1112515
	ID: 440802

Commission Expires: 04-74-7015

# AVERAGE METER CONNECTION EXPENSE COST JUSTIFICATION

ollowing is all in	emization of exp	enses for pro	viding a m	CICICU	SCIVICE	Connec
<u>Meter Size</u>						
5/8-Inch 🗆	3/4-Inch □	1-Inch 🛘	1 1/2 -Ind	ch 🗆	2-In	ch 🗆
Other (specify	5/8 x 3/4 Inch					
<u>Materials Ex</u>	<u>pense</u>	Unit Quantity	<u>Cost</u>		Total <u>Cost</u>	
Water Meter		1	120.00	-	120.00	-
Meter Yoke	•	1	241.71	_	241.71	_
Corporation S	itop	1	61.83	_	61.83	_
Meter Box an	d Top	1	67.48	_	67.48	_
Miscellaneous	s Fittings	None	0	-	0	-
Other (Itemize	e)	1		41.26		41.26
P.E. Tubing Ins	erts	2		1.87	-	3.74
MXU Transmitte				135.00	<del>-</del>	135.00

# C. <u>Service Pipe Expense</u>

2a. Long Side Service ( Push Rod Machine)

	Type of Service Pipe Polyethene	Tubing Siz	ce of Service F	Pipe
_	Ohart O'da Oarrina	Unit <u>Quantity</u> 15	<u>Cost</u> 0.53	Total <u>Cost</u> 7.95
1.	Short Side Service	70	0.53	37.10
2.	Long Side Service			
2a.	Long Side Service (1-1/2" Casing Pipe)	30	0.49	14.70
	AVERAGE SERVICE PIPE EXP (add total cost and divide	<del></del>		\$ <u>29.88</u>
D.	Installation Labor Expense			
		Total <u>Hours</u>	Hourly <u>Rate</u>	Total <u>Cost</u>
1.	Short Side Service	5	21.19	105.95 
2.	Long Side Service	9.1	21.19	192.83
	AVERAGE INSTALLATION LAB (add total cost and divide		E	\$ <u>149.39</u>
E.	Installation Equipment Expens	<u>se</u>		
		Total <u>Hours</u>	Hourly <u>Rate</u>	Total <u>Cost</u>
1.	Short Side Service (Backhoe)	1.1	60.00	66.00
2.	Long Side Service (Backhoe)	2.5	60.00	150.00

0.9

**AVERAGE INSTALLATION EQUIPMENT EXPENSE** 

(add total cost and divide by 2)

30.00

27.00

\$121.50

Installation Miscellaneous	Total	Hourly		Total	
	<u>Hours</u>	<u>Rate</u>		<u>Cost</u>	
Inspection	None ———	0		0	
Site Clean-Up 2 employees, 1 hour each Other	2	21.19	•	42.38	
Mileage: 1-ton service truck	30 r	mi 	0.565/mi	_	16.95
Dump truck & trailer - flat fee	N/A		N/A	<u>.                                    </u>	135.00
AVERAGE INSTALLATION (add total cost)		US EXPE	NSE	\$ <u>1</u>	94.33
Overhead Expense  1. Installation expense (\$	.0				
1. Installation expense (	S \ \times	200			
		162		. (	0
overhead rate (		165		\$_	0
		165		\$_	0
. overhead rate (	( <u>0</u> %)			\$_	0
. overhead rate (  Administrative Expense  1. Office expense for est	( <u>0</u> %)	account	51 per hou		19.51
. overhead rate (  Administrative Expense  1. Office expense for est	( <sup>0</sup> %) tablishing a new	account	51 per hou		
. overhead rate (  Administrative Expense  1. Office expense for est  and billing reco	( <sup>0</sup> %) tablishing a new	account	51 per hou	ır \$_	19.51
. overhead rate ( Administrative Expense  1. Office expense for est and billing reco  Total Expenses	( <sup>0</sup> %) tablishing a new	account	51 per hou	ır \$_	19.51 671.02
. overhead rate (  Administrative Expense  1. Office expense for est and billing reco  Total Expenses  Materials Expense	( <sup>0</sup> %) tablishing a new	account	51 per hou	ır \$_	19.51 671.02 29.88
. overhead rate (  Administrative Expense  1. Office expense for est and billing reco  Total Expenses  Materials Expense  Service Pipe Expense	(0%) tablishing a new	account	51 per hou	ır \$_	19.51 671.02 29.88 149.39
. overhead rate ( Administrative Expense  1. Office expense for est and billing reco  Total Expenses  Materials Expense  Service Pipe Expense  Installation Labor Expense	(0%) tablishing a neword. Office personnel:	account	51 per hou	ır \$_	19.51 671.02 29.88 149.39 121.50
Administrative Expense  1. Office expense for est and billing reconstruction  Total Expenses  Materials Expense  Service Pipe Expense  Installation Labor Expense  Installation Equipment Expense	(0%) tablishing a neword. Office personnel:	account	51 per hou	ır \$_	19.51 671.02 29.88 149.39 121.50
Administrative Expense  1. Office expense for est and billing reconstruction  Total Expenses  Materials Expense Service Pipe Expense Installation Labor Expense Installation Equipment Expense Installation Miscellaneous Expense	(0%) tablishing a neword. Office personnel:	account	51 per hou	ır \$_	19.51 671.02 29.88 149.39 121.50 194.33
Administrative Expense  1. Office expense for est and billing reconstruction  Total Expenses  Materials Expense Service Pipe Expense Installation Labor Expense Installation Equipment Expense Installation Miscellaneous Expense Overhead Expense	(0%) tablishing a neword. Office personnel:	account	51 per hou	" \$_ \$_	19.51 671.02 29.88 149.39 121.50 194.33